

SHER TREMONTE LLP

December 18, 2023

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VIA ECF

The Honorable Valerie E. Caproni
United States District Judge
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

Re: *United States v. Terrance Williams, 15-CR-537 (VEC)*

Dear Judge Caproni:

We previously represented Terrance Williams in the above-referenced matter pursuant to the Criminal Justice Act. On June 27, 2017, the Court sentenced Mr. Williams to 399 months' incarceration based on a Guidelines calculation of 324 to 405 months. *See* ECF No. 1117, at 10, 53. The Court calculated a criminal history score of 3 based on Mr. Williams having been on probation at the time of the offense. *Id.* at 10. As Your Honor knows, the Sentencing Commission in its recent amendment cycle promulgated Amendment 821, which eliminated so-called "status points" under U.S.S.G. § 4A1.1(d), and subsequently made the amendment retroactive, starting February 1, 2024. Because elimination of Mr. Williams's status points would move him from Criminal History Category II to Category I, he may be entitled to a sentencing reduction. Accordingly, pursuant to S.D.N.Y. Standing Order M10-468, we respectfully request that we be reappointed to investigate and pursue any claims Mr. Williams may have under Amendment 821. We note that while Mr. Biale was previously appointed as an associate on this matter, he has since become a member of the CJA Panel. We respectfully request that the Court appoint us jointly for the continuation of Mr. Williams's representation.

Respectfully submitted,

/s/ _____
Michael Tremonte
Noam Biale

cc: Terrance Williams (by U.S. Mail)

Application GRANTED.

12/18/2023

SO ORDERED.

A handwritten signature in blue ink, appearing to read "Valerie Caproni", is written in a cursive style.

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE